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F. #2021R00600

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

24-CR-346 (BMC)

LINDA SUN,
also known as “Wen Sun,” “Ling Da
Sun,” and “Linda Hu,” and
CHRIS HU,
Defendants..

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The United States of America, by and through BREON PEACE, United States Attorney for the Eastern District of New York, and Laura D. Mantell, Assistant United States Attorney, hereby files, pursuant to Federal Rule of Criminal Procedure 32.2(a), the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), 982(a)(2), and 982(b)(1), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), in connection with Counts One, Two, Eight, and Ten of the Indictment. The United States hereby gives notice to the defendants that, in addition to the property listed in the forfeiture allegations in the Indictment, the United States also seeks forfeiture of the following property:

all right, title and interest in the real property and premises located at [REDACTED]
[REDACTED] together with its appurtenances,
improvements, fixtures, easements, furnishings and attachments thereon, as
well as all leases, rents and profits therefrom, and all proceeds traceable
thereto.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
September 6, 2024

BREON PEACE
United States Attorney
Eastern District of New York
271-A Cadman Plaza East
Brooklyn, New York 11201

By: /s/ Laura D. Mantell
Laura D. Mantell
Assistant U.S. Attorney
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To: All Counsel of Record (by ECF)